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February 8, 2017

Hon. Laura T. Swain  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Courtroom 12D  
New York, NY 10007-1312

**Re: *Rosario v. Mis Hijos Deli Corp., et. al.***  
**CA No. 15-cv-6049 (LTS) (DCF)**

Your Honor,

We represent all six defendants in the above referenced matter. As Your Honor is aware, summary judgment motions are currently pending with respect to four of these defendants. As such, the parties are not in position to decide what motions in limine to make for what parties. Nevertheless, your Honor's pre-trial order requires that motions in limine be submitted by February 17, 2017, and that a Joint Pre-Trial Statement be submitted prior to the Pre-Trial Conference scheduled for March 17, 2017.

Given the above, we respectfully request a modification of the Pre-Trial Order to allow the parties the appropriate amount of time to submit their motions in limine after having received the Court's decision on the motions for summary judgment. Similarly, we respectfully request that the Court provide the parties with additional time to submit their Pre-Trial Statement until after such time as the motions in limine are decided.

Defendants reached out to opposing counsel and they did not respond to this request.

Thank you for your attention to this matter.

Very truly yours,

/s/ Argilio Rodriguez  
Argilio Rodriguez, Esq.

*Counsel for Defendants*